



VIRGINIA TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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Marlene Dortch, Secretary
Federal Communications Commission
45 12th Street, SW
Washington, DC 20554

Re: CC Docket 96-45

Dear Ms. Dortch:

On behalf of the Virginia Rural Telephone Companies I submitted the attached electronic message to Romanda Williams of the Wireline Competition Bureau in response to ex parte information provided by attorneys for Virginia Cellular concerning the exchange boundaries and density of the rural telecommunications carriers affected by Virginia Cellular's request for eligible telecommunications carrier status.

Respectfully submitted,

Earl D. Bishop
Executive Vice President

Copy: Romanda Williams, FCC
Lisa Zaina, Shentel
Ann Sarbin, Ntelos
Craig Smith, MGW

Romanda,

I'm sending you this message to comment on the data filed by Virginia Cellular regarding population density of Virginia RSA6 wirecenters.

First some general questions:

1. What is the source of the data? There is no defined geographic boundary called a wirecenter. There are other small subdivisions often used such as Census Block Group and Zip Code but they do not coincide with wirecenter.
2. Wirecenter area is somewhat of a misnomer which has been applied in this case. The defined area for regulatory purposes is the "exchange". A wirecenter is a switching location. Generally, in rural companies, there is one wirecenter per exchange but in large companies and cities, such as Richmond VA, there are multiple wirecenters in the exchange. For service and regulatory purposes, the exchange is the defined area.
3. The data includes all exchanges of Central Telephone Company, Shenandoah Telephone Company, and NTELOS, yet only certain exchanges are in RSA6.
4. No data is provided relative to Verizon Virginia or Verizon South areas. While the issue we raised is from the Virginia Rural Companies, the overall issue cannot ignore those areas.

Following are some specific data issues which question the accuracy or usefulness of the data.

1. Highland Telephone Company is listed as having a wirecenter population for its three wirecenters of 1,010 on 237.68 square miles. In fact Highland serves 1,450 access lines, a ratio of 1.4 lines per customer, across 216 square miles. Highland Telephone geographically serves approximate one-half of Highland County but serves approximately 75% of the population. The remainder is served by the McDowell exchange of MGW which has 469 access lines as compared to reported population of 278.
2. MGW Telephone serves portions of Highland, Augusta, and Bath Counties with a total of 1,627 access lines or 1,158 excluding McDowell which was discussed above. According to the submitted data, the population of this area is 942. This equate to 1.2 access lines per person which is not reasonable in a rural, low-income area with virtually no business customers. Exchange by exchange analysis exacerbates this conclusion.
3. NTELOS has reported that they serve 24,589 access lines in the Waynesboro exchange in 120 square miles. The submitted data reports the population of the wirecenter as 29,390, a ratio of 1.20 persons per access line.
4. For the Bergton exchange of Shenandoah Telephone, the company has reported 466 access lines and estimated the exchange territory as 51 square miles. The Virginia Cellular data indicates a population of 400 in 86 square miles. Again the disparity between the access lines and population invalidates the data, and the disparity between the area included also raises questions.
5. Only the North River, Mt Solon exchange, and New Hope areas seem to present consistent reliable data.

Thus while it may be desirable to review data by wirecenter or exchange; if reliable data is not available the most reliable data should be found. The industry data was taken from Census Bureau data and can be fully substantiated.

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Sent via e-mail 11-01-02

COMPANY CONFIDENTIAL INFORMATION

**Line Density of Virginia
Rural Telephone Companies Rev 10-10-02**

COMPANY	EXCHANGE	ACCESS LINES	SQ. MILES	LINES/ SQ MILE
		As of 12/31/01		
Highland	Blue Grass	315		
	Mill Gap	149		
	Monterrey	<u>986</u>		
	Total	1,450	216	6.7
MGW	Deerfield	489		
	McClung	306		
	McDowell	469		
	Williamsville	188		
	Mtn. Grove ¹	<u>175</u>		
	Total (in area)	1,627	580	2.8
New Hope	New Hope	1,017	50	20.3
North River	Mt. Solon	1,055	61	17.3
NTELOS	Waynesboro ²	24,589	120	204.9
	Clifton Forge ³	5,663		
	Covington	8,980		
	Potts Creek	718		
		15,361	531	28.93

¹ Mountain Grove exchange is not contiguous with other MGW exchanges.

² Waynesboro is in Augusta Co. separated from remainder of study area.

³ Clifton Forge, Covington, and Potts Creek are in Allegheny Co. which is approximately 50 miles from Waynesboro.